

No. 16-1466

IN THE SUPREME COURT OF THE UNITED STATES

MARK JANUS,

Petitioner,

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES, COUNCIL 31, *ET AL.*,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen, Inc., in Support of Respondents contains 3,836 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on January 18, 2018.



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